

9441.1985(08)

FEB 22 1985

Placid Refining Company
3900 Thanksgiving Tower
Dallas, TX 75201

Dear Mr. Walsh:

This letter is written in response to your February 14 correspondence which requests that EPA clarify whether a particular refinery wastewater treatment sludge is a listed hazardous waste (K048). The waste in question is generated by a dissolved air flotation device in use at the Placid Refinery in Port Allen, Louisiana, that is used as part of the secondary wastewater treatment system to remove biological solids from an activated sludge unit.

In a recent Federal Register notice (see Enclosure), the Agency has maintained that the K048 and K051 listings were intended only to address oil/solids/water separation from primary treatment. The word "secondary" was used in the background document and subsequently in the K048 listing to describe configurations where two primary wastewater treatment methods were used consecutively as compared to secondary treatment consisting of biological oxidation. The sludge from this unit is not currently a listed hazardous waste because the dissolved air flotation unit at the Placid Refinery is used to remove biological sludge from the treated effluent. Therefore, under the Federal hazardous waste management system, this waste would be hazardous only if it exhibits one or more of the hazardous waste characteristics.

At the same time, you should also be aware that EPA is concerned about secondary sludges from biological treatment of refinery wastewaters. Consequently, we are currently evaluating these wastes as part of the petroleum refining industry studies to determine whether they should be listed as hazardous. Please feel free to give me a call at (202) 475-8551 if you have any further questions.

Sincerely,

Matthew A. Straus, Chief
Waste Identification Branch

RO 11059

Enclosure